

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TALON TOOLS, LLC,

PLAINTIFF,

v.

THE PARTNERSHIPS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE No.: 1:25-cv-01193

JUDGE FRANKLIN U. VALDERRAMA

MAGISTRATE JUDGE HEATHER K. MCSHAIN

**MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT  
AGAINST THE DEFENDANTS IDENTIFIED ON AMENDED SCHEDULE A**

Plaintiff, Talon Tools, LLC (“Talon” or “Plaintiff”), hereby moves this Honorable Court for entry of Default and Default Judgment against the Defendants identified on Amended Schedule A (the “Defaulting Defendants”), attached hereto. Plaintiff files herewith a Memorandum of Law in support.

Dated: July 17, 2025

Respectfully submitted,

/s/ Gouthami V. Tufts

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 17, 2025, a true and correct copy of the above and foregoing document was: electronically filed, with the Clerk of the Court using the CM/ECF system; electronically published on a website to which the Defendants have been directed pursuant to the Service of Process; and emailed to all email addresses identified or provided for Defendants by the Defendants or third-parties, which includes a link to said website and a copy of the documents which have been filed by the Plaintiff.

/s/ Gouthami V. Tufts  
Gouthami V. Tufts